

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

JOHNNY M. HUNT,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 3:23-cv-00243
)	
SOUTHERN BAPTIST CONVENTION;)		Judge Campbell
GUIDEPOST SOLUTIONS LLC; and)		Magistrate Judge Frensley
EXECUTIVE COMMITTEE OF THE)		Jury Demand
SOUTHERN BAPTIST CONVENTION,)		
)	
Defendants.)	

RESPONSE TO MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Rule 7.01 of the Local Rules of Court, Plaintiff Johnny M. Hunt, by and through the undersigned counsel, hereby respectfully submits his Response to the Motion for Leave to File Under Seal filed by Defendant Guidepost Solutions LLC (ECF Doc. No. 64).

As explained more fully in the accompanying Memorandum in Support of Plaintiff's Response to the Motion for Leave to File Under Seal filed by Defendant Guidepost Solutions LLC, Plaintiff opposes the attempt by Defendant Guidepost Solutions LLC ("Guidepost") to hide its damaging admissions from the public. None of the information Guidepost seeks to maintain under seal is confidential, and Guidepost has failed to carry its heavy burden of "analyzing in detail, document by document, the propriety of secrecy, providing factual support and legal citations," as required by Rule 5.03 of the Local Rules of Court and the directives of the United States Court of Appeals for the Sixth Circuit in its precedent, including in its holdings in *Beauchamp v. Federal Home Loan Mortgage Co.*, 658 Fed. Appx. 202, 207 (6th Cir. 2016) and

Hlfp Holdings, Inc. v. Rutherford Cnty., No. 3:19-cv-00714, 2023 U.S. Dist. LEXIS 190478, *2-4 (M.D. Tenn. Mar. 8, 2023) (emphasis added).

For the foregoing reasons, as well as the reasons set forth in the accompanying Memorandum, this Court should deny the Motion for Leave to File Under Seal (ECF Doc. No. 64) in its entirety.

Dated: October 27, 2023 Respectfully submitted,

s/ Andrew Goldstein

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Response to Motion for Leave to File Under Seal has been served on October 27, 2023, using the CM/ECF system, which will automatically serve all counsel of record listed below:

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